

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ABDULRAHMAN ALHARBI,)	
)	
Plaintiff,)	
)	
v.)	Civil Action
)	No. 14-11550-PBS
GLENN BECK; THE BLAZE, INC.;)	
MERCURY RADIO ARTS, INC.; and)	
PREMIERE RADIO NETWORKS, INC.,)	
)	
Defendants.)	
_____)	

PLAINTIFF'S MOTION TO COMPEL DISCLOSURE OF ALLEGED
CONFIDENTIAL SOURCE INFORMATION

The Plaintiff Abdulrahman Alharbi moves the Court in accordance with Rule 37 of the Federal Rules of Civil Procedure to compel the disclosure of certain discovery information that the Defendants have refused to provide in this action based on the claim of a "confidential source" privilege. In support of his motion, the Plaintiff submits herewith his Memorandum of Law In Support of Motion to Compel Disclosure of Alleged Confidential Source Information and the Affidavit of Counsel Authenticating Discovery Materials.

The Memorandum incorporates, and the Affidavit appends, discovery information that the parties have agreed to treat as "Confidential" in accordance with the Stipulation and Protective Order [Docket No. 66], previously entered in this action. The Plaintiff, accordingly, seeks leave to file those materials under seal.

The Plaintiff certifies that, in accordance with Local Rule 7.1(a)(2), counsel has conferred in person and by phone with counsel in good faith in an attempt to resolve or narrow the issues that are presented in this motion.

Wherefore, the Plaintiff prays that the Court enter an Order; (1) compelling the Defendants to produce any and all information concerning the identity of the "confidential sources"; (2) that the Defendants supplement and amend any discovery responses which have withheld information based on the assertion of the 'confidential source' privilege; (3) that the Defendants supplement their production of documents by providing un-redacted copies of documents that have been redacted to shield the identity of 'confidential sources'; (4) that the time for discovery be extended to allow the Plaintiff to review, assess and respond to the supplemental production and conduct further discovery production and to conduct further discovery based on those responses; and (5) that the Court grant such other and further relief as is just.

ABDULRAHMAN ALHARBI

By his attorneys,

/s/ Peter J. Haley
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Dated: April 29, 2016

CERTIFICATE OF SERVICE

I, Peter J. Haley, hereby certify that on this 29th day of April, 2016 this pleading was filed through the ECF system and will be sent electronically to counsel to the Defendants in this action.

/s/Peter J. Haley
Peter J. Haley